

Title: Monitoring

Purpose

The State WIC Office monitors all local WIC agencies to ensure compliance within Federal Regulations and State Policies and Procedures, local program nutrition education plans, as well as evaluate program quality and provide assistance to facilitate program improvement.

Authority

7CFR 246.19

Policy

The State WIC Office will assure all local agencies provide an effective and quality program.

I. On-site Reviews

- A. The State WIC Office staff will perform on-site reviews of all local agencies biennially at a minimum of 25% of their clinics.
- B. These visits will determine compliance with:
 - 1. Federal Regulations
 - 2. State Policies and Procedures
 - 3. Local program nutrition education plans
- C. These visits will also:
 - 1. Evaluate program quality
 - 2. Provide assistance to facilitate program improvement

II. State WIC Office Responsibilities

- A. The State WIC Office will inform USDA of unresolved problems, delays or adverse conditions found during an on-site visit.
- B. The State WIC Office will provide technical assistance and training to local agencies when necessary and applicable for resolution of monitoring recommendations.
- C. State WIC Office staff, consisting of a Nutritionist and a Program Specialist, will review participant records prior to the local program visit to observe staff and clinic procedures.
- D. The Monitoring Attachments set forth the questions that will be used to review the WIC records.
- E. A schedule for the entire 12-month period of the Federal Fiscal Year will be prepared by October 1st. This tentative schedule is based on past years' experience in terms of weather and efficient use of travel time, however, it is subject to change. The needs and schedules of each local agency are usually accommodated.

III. Federal Office Responsibilities

- A. The Regional Office of USDA will perform a management evaluation of the State WIC Office as needed which includes on-site visits to a representative number of local agencies.

IV. Local Agency Responsibilities

- A. The local agency will maintain records for each participant.

1. The local agency records will be available to State and Federal WIC Offices for monitoring.
- B. The local agency will respond and follow-up on recommendations made by the Federal or State WIC Office as a result of the monitoring visit.

V. Monitoring Procedures

- A. A random representative sampling of participant records will be selected and reviewed in-house at the state office by State WIC Office staff.
- B. The State WIC Office staff conducts an entrance interview with local agency personnel before the on-site monitoring begins.
- C. State WIC Office staff observes local agency operations on-site.
- D. The State WIC Office staff conducts an exit interview with the appropriate local WIC agency staff and gives a verbal report of its findings.
 1. A discussion of improvement from past visits, resolutions of problems, non-compliance and/or revisions in procedures is appropriate during this interview.
- E. Within 30 days after the visit, a written report of the State WIC Office's findings and recommendations are sent to:
 1. Local Health Officer/County Commissioners
 2. Local WIC program CPA and/or Program Manager
- F. Within 30 days after receipt of the monitoring findings, the local agency will respond in writing, with a corrective action plan stating how and when corrections or revisions of compliance will be accomplished.
- G. If the local agency's corrective action plan is deemed appropriate, no further actions for correction are needed.
 1. The State WIC Office will acknowledge in writing that the local agency's response is acceptable.
 2. If major areas of concern remain uncorrected or are not addressed in the corrective action plan the State WIC Office will acknowledge in writing that the local agency's response is unacceptable.

VI. Nutrition Services Review

- A. Local agency operations are evaluated for nutrition service compliance.
- B. Records are reviewed and the environment and clinic procedures are observed.
- C. This visit also serves as an assessment of training needs of local staff.

VII. Administrative Review

- A. The administrative team member will review the client records for complete documentation of:
 1. Income
 2. Proof of residency
 3. Proof of identification
 4. Notice of end of certification/ineligibility
 5. Benefits signed for
- B. Conduct a visual site review for:

1. Space
 2. Security
 3. Privacy
 4. Verify inventory
- C. Review original documents (timesheets/cards for WIC employees, telephone bill and how it is distributed among programs, bills for office supplies, rent, etc.).
1. If rent is distributed among programs, written justification for the plan or method used will need to be available. A general guide is that the “paper trail” of expenses claimed must be easy and convenient to follow.

VIII. Local Agency Self-Monitoring

- A. Federal Regulations require that each local agency establish a system by which they review their own program operations and that of their satellites.
- B. State WIC Office staff recommends local agencies utilize the same methods and materials state monitoring teams will use at biannual monitoring visits.
 1. Local agencies will maintain results of their reviews on file.